

1 Guido Saveri (22349) guido@saveri.com
2 R. Alexander Saveri (173102) rick@saveri.com
3 Geoff Rushing (126910) grushing@saveri.com
4 Cadio Zirpoli (179108) cadio@saveri.com
5 SAVERI & SAVERI, INC.
6 706 Sansome Street
7 San Francisco, CA 94111
8 Telephone: (415) 217-6810
9 Facsimile: (415) 217-6813

10 Interim Lead Counsel for the Direct Purchaser Plaintiffs

8
9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 IN RE: CATHODE RAY TUBE (CRT)
14 ANTITRUST LITIGATION

Master File No. CV- 07-5944-SC

MDL No. 1917

15 This Document Relates to:

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF SAVERI &
SAVERI, INC.'S OPPOSITION TO SHARP
MOTION TO COMPEL**

16 Date: September 20, 2012

17 Time: 2:00 p.m.

Judge: Honorable Charles A. Legge (Ret.)

JAMS: Two Embarcadero Center, Suite 1500

I, R. Alexander Saveri, declare:

1. I am a partner with Saveri & Saveri, Inc. ("Saveri"), Interim Lead Counsel for Direct Purchaser Plaintiffs in this litigation. I am a member of the Bar of the State of California and an attorney admitted to practice in the Northern District of California. I make this Declaration in Support of Saveri & Saveri, Inc.'s Opposition to Sharp's Motion to Compel Saveri & Saveri, Inc. to Comply with Subpoena. Except as otherwise stated, I have personal knowledge of the facts stated below.

2. The discovery produced in this litigation consists of over five million pages of documents.

3. Defendants have produced documents over several years via scores of transmittals in a myriad of formats. For example, Defendants have produced documents via CD-ROM, via hard drive, via emailed zip files, via emailed pdf files; and via FTP website.

4. Although Saveri has laboriously transferred all of these files to a server, the documents are contained in separate files. I estimate that it will take at least 30 to 40 hours of labor by Saveri's IT department to comply with the subpoena.

5. While Saveri might be able to outsource some of the work of complying with the subpoena, much of it will occupy personnel who have more important and productive things to be doing.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 15th day of September, 2012, in San Francisco, California.

/s/ R. Alexander Saveri

R. Alexander Saveri

crt.571